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*Attorneys for Plaintiff individually and on behalf of all
others similarly situated*

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

ADVANCED INTERVENTIONAL PAIN &
DIAGNOSTICS OF WESTERN ARKANSAS,
LLC, on behalf of itself and all others similarly
situated,

Plaintiff,

v.

PARADIGM MANAGEMENT SERVICES,
LLC, ADVA HOLDINGS, LLC,
ENCOMPASS SPECIALTY NETWORK,
LLC,

Defendants.

CASE NO.: 3:19-cv-08337-VC

**STIPULATED REQUEST AND
[PROPOSED] ORDER TO EXTEND
MOTION TO DISMISS BRIEFING
DEADLINES AND CONTINUE HEARING**

Hon. Vince Chhabria

Plaintiff Advanced Interventional Pain & Diagnostics of Western Arkansas, LLC, on behalf of itself and all others similarly situated (“Plaintiff”), and Defendants Paradigm Management Services, LLC, Adva Holdings, LLC, and Encompass Specialty Network, LLC (collectively, “Defendants”), pursuant to Rule 6-1(b) of the Local Rules of the Northern District of California, hereby jointly file this stipulated request for an order extending the briefing schedule for Defendants’ Motion to Dismiss Amended Class Action Complaint for sixty (60) days, so that judicial resources and litigation resources can be spared while the parties attempt to reach an amicable resolution of this dispute by way of a mediation. The parties further stipulate to continue the scheduled hearing date in this matter.

On August 25, 2020, the Parties filed their Joint Status Report Regarding ADR, (ECF No. 53), in which the Parties notified the Court they believed this case would be a good candidate for settlement and proposed submitting to the Court an additional report regarding settlement before September 15, 2020. Defendants then filed their Motion to Dismiss on August 28, 2020. (ECF No. 56.) Pursuant to Local Rule 7-3(a), Plaintiff’s Opposition is due Friday, September 11, 2020. Defendants’ Reply is due September 18, 2020. *See* Civil L.R. 7-3(c). A hearing is set for October 8, 2020.

The Parties have continued their discussions regarding the possibility of settling this case and are now pleased to report they have agreed to a mediation. The parties have agreed to extend the Motion to Dismiss briefing deadlines and continue the scheduled hearing until after the mediation is concluded and all settlement efforts with the mediator have been exhausted, so they can devote the necessary time, attention, and resources to meaningfully prepare for and participate in a good faith mediation. This requested time modification and hearing continuance will not affect

any other Case Schedule deadlines as set forth in the scheduling order. (ECF No. 45.) In accordance with Civil L.R. 6-2, an accompanying declaration by Randall K. Pulliam has been filed contemporaneously with this Stipulated Request.

DATED: September 8, 2020

Respectfully submitted,

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By: /s/ Molly K. McGinley

By: /s/ Randall K. Pulliam

Attorneys for Defendants

Attorneys for Plaintiff

ECF ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that all signatories concur with this filing.

/s/ Randall K. Pulliam


[~~PROPOSED~~] ORDER

The Court having considered the Stipulation to extend the deadlines for the Parties' briefing schedule and continue hearing concerning Defendants' Motion to Dismiss Amended Class Action Complaint, ORDERS as follows:

1. Plaintiff's deadline to file its opposition to Defendants' Motion to Dismiss is moved to November 10, 2020.
2. Defendants' deadline to reply to Plaintiff's opposition is moved to November 17, 2020.
3. The hearing scheduled for October 8, 2020 is continued ~~until further notice.~~
until December 3, 2020.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: September 8, 2020



Hon. Vince Chhabria
United States District Judge